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8 *Attorneys for Defendants, DIRECTV, LLC and AT&T Services, Inc.*

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11 **UNITED STATES DISTRICT COURT**  
12 **DISTRICT OF NEVADA**

13 TIMOTHY TEXEIRA,

14 Plaintiff,

15 vs.

16 NATIONAL CONSUMER TELECOM &  
17 UTILITIES EXCHANGE, INC.; LAC DU  
18 FLAMBEAU BAND OF LAKE SUPERIOR  
19 CHIPPEWA INDIANS DBA NIIZHWAASWI,  
20 LLC DBA LOAN AT LAST, CNU ONLINE  
21 HOLDINGS, LLC, ONE MAIN FINANCIAL,  
22 DIRECTV, LLC, AT& T CORP DBA AT&T  
23 UVERSE, CLARITY SERVICES LLC,  
24 BACKGROUNDCHECKS.COM, LLC,

25 Defendants.

Case No.: 2:22-cv-00153-GMN-DJA

26 **JOINT MOTION TO EXTEND**  
27 **DEADLINE TO RESPOND TO**  
28 **PLAINTIFF’S COMPLAINT (SECOND**  
**REQUEST)**

Plaintiff, Timothy Texeira (“Plaintiff”), and Defendant, DIRECTV, LLC and AT&T Services, Inc. (erroneously sued as “AT&T Corp. dba AT&T uVerse”) (“Defendants”) (collectively “Parties”), by and through their counsel of record, hereby stipulate and agree as follows:

On January 27, 2022, Plaintiff filed his Complaint [ECF No. 1]. Defendants were served with Plaintiff’s Complaint on January 31, 2022. One February 10, 2022, the Parties filed a Joint Motion to Extend the Deadline to Respond to Plaintiff’s Complaint (“Motion”) [ECF No. 12] and the Court entered an Order granting Motion [ECF No. 13]. The deadline for Defendants to respond to Plaintiff’s Complaint is March 21, 2022. The Parties have discussed extending the deadline for Defendants to respond to Plaintiff’s Complaint to allow for better investigation of the allegations

1 and discuss possible resolution of the matter.

2 WHEREAS, the Parties hereby stipulate and agree to extend the deadline for Defendants  
3 to file their responsive pleading to Plaintiff's Complaint to April 11, 2022.

4 This is the second motion for an extension of time for Defendants to file their responsive  
5 pleading. The extension is requested in good faith and is not for purposes of delay or prejudice to  
6 any other party.

7 As part of this motion, Defendants agree to participate in any Rule 26(f) conference that  
8 occurs during the pendency of this extension.

9 DATED this 21st day of March, 2022.

10  
11 WRIGHT, FINLAY & ZAK, LLP

FREEDOM LAW FIRM

12 /s/ Ramir M. Hernandez

/s/ Gerardo Avalos

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17 *Attorneys for Defendants, DIRECTV, LLC*  
18 *and AT&T Services, Inc.*

*Attorneys for Plaintiff, Timothy Texeira*

19  
20 IT IS SO ORDERED:

21   
22 \_\_\_\_\_  
23 DANIEL J. ALBREGTS  
24 UNITED STATES MAGISTRATE JUDGE

25 DATED: March 22, 2022  
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27  
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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that I am an employee of WRIGHT, FINLAY & ZAK, LLP and that I served the foregoing **JOINT MOTION TO EXTEND TIME TO RESOND TO PLAINTIFF'S COMPLAINT (SECOND REQUEST)** on the 21st day of March, 2022, to all parties on the CM/ECF service list.

/s/ Lisa Cox

An Employee of WRIGHT, FINLAY & ZAK, LLP